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Attorneys for Plaintiffs,
UTHERVERSE, INC. and BRIAN SHUSTER

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA – RENO DIVISION

UTHERVERSE, INC., a Nevada corporation,
BRIAN SHUSTER, an individual,

Plaintiffs,

v.

BRIAN QUINN, an individual; JOSHUA
DENNE, and individual; BLOCKCHAIN
FUNDING, INC. a Delaware corporation;
BLOCKCHAIN ALLIANCE LLC, a
Wyoming Limited Liability Company;
MASTERNODE PARTNERS, LLC, a
Wyoming Limited Liability Company;
LYNNE MARTIN, an individual; NIYA
HOLDINGS, LLC, a Nevada limited liability
company; NIMA MOMAYEZ, an individual;
and JEREMY ROMA, an individual,

Defendants.

AND RELATED CROSS-CLAIM.

Case No.: 3:25-cv-00020-MMD-CSD

**DECLARATION OF SHERRIE M.
FLYNN IN SUPPORT OF PLAINTIFF'S
REQUEST FOR ENTRY OF DEFAULT
AGAINST JEREMY ROMA**

1 I, Sherrie M. Flynn, declare as follows:

2 1. I am an attorney at Coleman & Horowitz, LLP, counsel for Plaintiffs,
3 UTHERVERSE, INC. and BRIAN SHUSTER (collectively, "Plaintiffs").

4 2. The facts contained in this declaration are based on my own personal knowledge and
5 my review of relevant records, and if called upon as a witness, I could and would competently testify
6 thereto.

7 3. Plaintiffs filed their complaint against Defendants for Violation of the Racketeer
8 Influenced and Corrupt Organizations Act (18 U.S.C. §§ 1961 Et Seq.); Fraud in the Inducement;
9 Intentional Misrepresentation (Fraud); Conversion; Breach of Fiduciary Duty; Aiding and Abetting
10 Breach of Fiduciary Duty; And Tortious Interference With Contract on January 10, 2025.

11 4. On January 25, 2025, Plaintiffs caused the summons, complaint, and related
12 documents to be served on Defendant, JEREMY ROMA. A true and correct copy of the proof of
13 service of summons is on file with this Court (*see* Doc. 28) and is attached hereto as **Exhibit A**.

14 5. The time for filing an answer or other response as to Defendant expired on February
15 17, 2025.

16 6. Defendant has failed to appear or otherwise respond to the complaint within the time
17 prescribed by the Federal Rules of Civil Procedure.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct and that this declaration was executed on March 21, 2025, at Fresno,
20 California.

21
22
23 By: /s/ Sherrie M Flynn
24 SHERRIE M. FLYNN
25
26
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28

EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address) Sherrie Flynn SBN 240215 Coleman & Horowitz 499 W. Shaw Avenue Suite 116 Fresno, CA 93704 ATTORNEY FOR Plaintiff			TELEPHONE NUMBER (559) 248-4820	FOR COURT USE ONLY
NEVADA DISTRICT, RENO 400 S. Virginia Street Reno, NV 89501				
SHORT TITLE OF CASE: Uthervse Inc. v. Quinn, Brian				
DATE:	TIME:	DEP./DIV.	CASE NUMBER: 3:25-cv-00020	
Declaration of Service			Ref. No. or File No: 12865.77	

United States District Court

I certify that I am authorized to serve the Summons and Complaint in the within action pursuant to F.R.Civ.P 4(c) and that I served the:
Summons-Federal; Complaint; Exhibits to Complaint- Exhibit A; Exhibits to Complaint- Exhibit B; Civil Cover Sheet; Certificate of Interested Parties

On: **JEREMY ROMA, an individual**

I served the summons at:

19221 Parker Cir Villa Park, CA 92861

On: **1/25/2025** Time: **12:20 PM**

In the above mentioned action by substituted service and leaving with

Clancy Carter - Co-occupant

A declaration of diligence and/or mailing is attached if applicable

Person attempting service:

- a. Name: **Bryce Keizer**
- b. Address: **15345 Fairfield Ranch Rd Suite 200, Chino Hills, CA 91709**
- c. Telephone number: **909-664-9577**
- d. **The fee** for this service was: **126.00**
- e. I am an independent contractor:

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the return of service and statement of fees is true and correct.

Bryce Keizer

Date: **01/27/2025**

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address) Sherrie Flynn SBN 240215 Coleman & Horowitz 499 W. Shaw Avenue Suite 116 Fresno, CA 93704 ATTORNEY FOR Plaintiff			TELEPHONE NUMBER (559) 248-4820	FOR COURT USE ONLY
NEVADA DISTRICT, RENO 400 S. Virginia Street Reno, NV 89501				
SHORT TITLE OF CASE: Uthervse Inc. v. Quinn, Brian				
DATE:	TIME:	DEP./DIV.	CASE NUMBER: 3:25-cv-00020	
Declaration of Service by Mail			Ref. No. or File No: 12865.77	

United States District Court

I, the undersigned, declare under penalty of perjury that I was on the date herein referred to over the age of 21 years and not a party to the within entitled action.

On **01/27/2025**, I served the within:

Summons-Federal; Complaint; Exhibits to Complaint- Exhibit A; Exhibits to Complaint- Exhibit B; Civil Cover Sheet; Certificate of Interested Parties

On the defendant, in said action by placing a true copy thereof enclosed in a sealed envelope with postage thereon pre-paid for first class in the United States mail at: **Chino Hills**, California, addressed as follows:

JEREMY ROMA, an individual
19221 Parker Cir Villa Park, CA 92861

Declarant:

- a. Name: **Tatianna Williams**
- b. Address: **15345 Fairfield Ranch Rd Suite 200, Chino Hills, CA 91709**
- c. Telephone number: **909-664-9577**
- d. **The fee** for this service was: **126.00**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the return of service and statement of fees is true and correct.



Tatianna Williams

Date: **01/27/2025**

